

STORCH AMINI & MUNVES PC

A New York Professional Corporation

Avery Samet
Member NY Bar

e-mail: asamet@samlegal.com
direct: 212.497.8239

March 30, 2015

VIA ECF

The Honorable Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street, Room 1950
New York, New York 10007

Re: In re LightSquared, Inc. *et al.*
Bankruptcy Appeal No. 15-cv-2342 (Chapter 11 Case No. 12-12080)

Dear Judge Forrest:

We are counsel to Sanjiv Ahuja, record holder of approximately 8% of the common equity interests in debtor LightSquared Inc., the parent entity of the debtors in the above-referenced bankruptcy case. On March 27, 2015, the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") entered an order (the "Order") confirming the Debtors' Modified Second Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code (the "Plan") and overruling Mr. Ahuja's objections thereto [Chapter 11 Case No. 12-12080, Dkt. No. 2276]. Also on March 27, 2015, Mr. Ahuja filed his Notice of Appeal of the Order.

Mr. Ahuja intends to prosecute this appeal as expeditiously as possible, both for the benefit of all parties and to avoid the danger that his claims will be equitably mooted through substantial consummation of the Plan. Unfortunately, the Effective Date of the Plan is currently unknown and the Order waives the various 14-day stays provided for by the Federal Rules of Bankruptcy Procedure. We have been, and still are, attempting to work with the Debtors to reach an agreement pursuant to which they would give Mr. Ahuja prior notice of any acts that could cause a stay to be necessary, but, at present, no agreement has been reached.

Therefore, we respectfully request that the Court direct the parties to appear at a status conference at its earliest convenience to set an expedited briefing schedule that addresses these concerns.

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Finally, for the Court's convenience we attach hereto the decision of the Bankruptcy Court denying Mr. Ahuja's objection, which the Bankruptcy Court read into the record at a hearing held on March 26, 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'A. Samet'.

Avery Samet

Encl.

cc: Matthew Scott Barr, Esq. (*via email*)
Andrew M. Leblanc, Esq. (*via email*)
ECF List